



September 4, 2018

Via ECFS

Ms. Marlene Dortch
Secretary, Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket No. 18-141

Dear Ms. Dortch:

Pursuant to the Protective Order adopted in the above-referenced proceeding,¹ USTelecom – The Broadband Association (USTelecom) hereby files hereby files this public, redacted version of materials containing company-specific data detailing the number of incumbent LEC dark fiber unbundled network element (UNE) transport circuits and corresponding dark fiber miles. These data provided by the largest four ILECs – AT&T, CenturyLink, Frontier and Verizon – show that they sell less than 6,000 dark fiber UNE circuits, compared to the estimated 2.1 million total UNE circuits sold nationwide. These circuits are conservatively estimated to cover 20,000 to 60,000 dark fiber miles. By comparison, just one competitive fiber provider reports 11.8 million dark fiber miles.²

USTelecom has also filed a HIGHLY CONFIDENTIAL version of this submission with the Commission's Secretary.

Please contact the undersigned if you have any questions.

Sincerely,

Jonathan Banks
Senior Vice President, Law & Policy

[Encl. Contains Redacted Highly Confidential Information]

¹ *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141, Protective Order, DA 18-575 (June 1, 2018).

² See “Dark Fiber,” <https://www.zayo.com/services/dark-fiber/>, visited Aug. 28, 2018.

Total Operator Counts

Dark Fiber UNE Circuits

| | Total Estimated Circuits | Total Strand Miles | Notes | Source |
|-------------|-----------------------------|-----------------------|-------|--------|
| Verizon | | | | |
| AT&T | | | | |
| CenturyLink | | | | |
| Frontier | | | | |
| Total | | | | |

AT&T

| SW, MW & W State's | CA | NV | AR | KS | MO | OK | TX | IL | IN | MI | OH | WI | Total Miles |
|--------------------------------------|----|----|----|----|----|----|----|----|----|----|----|----|-------------|
| UNE Dark Fiber Transport Total Miles | | | | | | | | | | | | | |
| Urban | | | | | | | | | | | | | |
| Suburban | | | | | | | | | | | | | |
| Rural | | | | | | | | | | | | | |

| SE State's | AL | FL | GA | KY | LA | MS | NC | SC | TN | Total Routes |
|---------------------------------------|----|----|----|----|----|----|----|----|----|--------------|
| UNE Dark Fiber Transport Total Routes | | | | | | | | | | |
| Urban | | | | | | | | | | |
| Suburban | | | | | | | | | | |
| Rural | | | | | | | | | | |

Average Number of Miles per Route in 3 of 4 Regions
Implied No. of Routes
Total Routes

| | |
|--|--|
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